

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Consolidated Civil Action**

RALEIGH WAKE CITIZENS  
ASSOCIATION, et al.

Plaintiffs,

v.

WAKE COUNTY BOARD  
OF ELECTIONS,

Defendant.

No. 5:15-cv-156

CALLA WRIGHT, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA,  
et al.,

Defendants.

No. 5:13-cv-607

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**DECLARATION OF ALLISON J. RIGGS IN SUPPORT OF PLAINTIFFS' PETITION FOR  
ATTORNEYS' FEES AND NON-TAXABLE COSTS**

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I, Allison J. Riggs, declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal knowledge of the matters stated herein. I submit this declaration in support of Plaintiffs' Petition for Attorneys' Fees and Non-Taxable Costs.

2. I am a senior staff attorney at the Southern Coalition for Social Justice in Durham, NC.  
My organization was retained to represent Plaintiffs in above-titled actions. I have been responsible for assembling all the data and records relevant to establishing the costs incurred by Plaintiffs in the course of litigating the two above-captioned cases.
3. I prepared the Bill of Taxable Costs submitted pursuant to Rule 54(d) of the Federal Rules of Civil Procedure, 28 U.S.C. § 1920, and Local Rule 54.1 of the Eastern District of North Carolina, which is being filed today, separate from the Petition for Attorneys' Fees and Non-Taxable Costs. I also prepared the Bill of Taxable Costs submitted to the Fourth Circuit Court of Appeals.
4. The Fourth Circuit Court of Appeals has already added appellate taxable costs in the amount \$2,689.00 to the mandate issued in these consolidated cases.
5. In preparing our costs and expenses reports, I reviewed and assembled records from contemporaneous, documented expense records regularly prepared and maintained by the Southern Coalition for Social Justice in the regular course of business.
6. Attached as Exhibit A to my declaration is a chart detailing the costs and expenses incurred during the course of the litigation. The total amount of costs incurred was \$56,831.34. The costs are broken down by category, and include a description for each cost item.
7. Attached as Exhibit B are the records pertaining to the expert work performed by Dr. Jowei Chen, including the development of his report and his testimony at trial..
8. Attached as Exhibit C are the records pertaining to the expert work performed by Anthony Fairfax, including the development of his report and his testimony at trial. It is Mr. Fairfax's billing practice that he performs work at the hourly rate until his

engagement fee (outlined in the attached retainer agreement) is exhausted. He then completes the project, and only charges for any additional time spent after the exhaustion of the engagement fee if that time was substantial. In this case, for the development of his report, Mr. Fairfax did not charge us for any time spent beyond what the engagement fee covered.

9. Plaintiffs seek recovery of \$9,057.68 in taxable costs reasonably and necessarily incurred in the prosecution of this case, including the \$2,689.00 already awarded by the Fourth Circuit Court of Appeals. Thus, we seek the difference--\$6,367.88—as taxable costs in the District Court.
10. Plaintiffs seek the rest of the amount—\$47,773.66—as reasonable non-taxable costs and/or litigation expenses necessary to the successful outcome in this litigation.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 23, 2016.

/s/ Allison J. Riggs

Allison J. Riggs  
N.C. State Bar No. 40028  
Southern Coalition for Social Justice  
1415 West Highway 54, Suite 101  
Durham, NC 27707  
Telephone: 919-323-3380  
Fax: 919-323-3942  
[Allison@southerncoalition.org](mailto:Allison@southerncoalition.org)

# **EXHIBIT A**

**RWCA/Wright Expenses**

| Category               | Description  | Date       | Amount      | Appellate Bill of Costs - Awarded | District Court Bill of Costs - Sought | District Court Non-Taxable Costs Sought |
|------------------------|--|------------|-------------|-----------------------------------|---------------------------------------|---|
| Filing Fees            |  |            |             |                                   |                                       |   |
|                        | Wright filing fee- complaint   | 8/22/2013  | \$400.00    |                                   | \$400.00 sought                       |   |
|                        | Wright filing fee- notice of appeal  | 4/7/2014   | \$505.00    | \$500.00 awarded                  | \$5.00 sought                         |   |
|                        | RWCA filing fee - complaint  | 4/7/2015   | \$400.00    |                                   | \$400.00 sought                       |   |
|                        | RWCA filing fee - notice of appeal   | 3/14/2016  | \$505.00    | \$500.00 awarded                  | \$5.00 sought                         |   |
|                        | Wright filing fee - notice of appeal   | 3/14/2016  | \$505.00    | \$500.00 awarded                  | \$5.00 sought                         |   |
| Appeals Printing Costs |  |            |             |                                   |                                       |   |
|                        | Wright - opening brief and joint appendix  | 5/23/2014  | \$1,074.44  | \$172.50 + \$150.00 awarded       |                                       | \$751.94                                |
|                        | Wright - reply brief   | 7/17/2014  | \$486.21    | \$55.50 awarded                   |                                       | \$430.71                                |
|                        | RWCA/Wright - opening brief and joint appendix   | 4/15/2016  | \$4,970.00  | \$66.00 + \$722.40 awarded        |                                       | \$4,181.60                              |
|                        | RWCA/Wright - reply brief  | 4/29/2016  | \$542.33    | \$23.40 awarded                   |                                       | \$518.93                                |
| Transcript Costs       |  |            |             |                                   |                                       |   |
|                        | Transcription/Copy of 4/17/13 hearing on SB 325,<br>Transcription/Copy of 3/5/15 hearing on SB 181,<br>Transcription/Copy of 3/10/15 hearing on SB 181   | 1/31/2016  | \$1,041.75  |                                   | \$1,041.75 sought                     |   |
|                        | Transcription/Copy of 6/10/13 hearing on SB 325,<br>Transcription/Copy of 4/1/15 hearing on SB 181,<br>Transcription/Copy of 3/12/15 hearing on SB 181,<br>Transcription/Copy of 4/22/13 hearing on SB 325,<br>Transcription/Copy of 3/11/15 hearing on SB 181 | 1/31/2016  | \$1,738.08  |                                   | \$1,738.08 sought                     |   |
|                        | Transcript from RWCA/Wright Trial Dec. 2015  | 2/3/2016   | \$1,668.05  |                                   | \$1,668.05 sought                     |   |
|                        | Transcript from RWCA/Wright Remedy Hearing   | 8/2/2016   | \$1,105.00  |                                   | \$1,105.00 sought                     |   |
| Contracted Services    |  |            |             |                                   |                                       |   |
|                        | Expert fees/costs - Jowei Chen - report  | 12/31/2015 | \$20,000.00 |                                   |                                       | \$20,000.00                             |
|                        | Expert fees/costs - Jowei Chen - trial testimony   | 12/26/2015 | \$7,413.42  |                                   |                                       | \$7,413.42                              |
|                        | Expert fees/costs - Anthony Fairfax - retainer   | 11/6/2015  | \$2,000.00  |                                   |                                       | \$2,000.00                              |
|                        | Expert fees/costs - Anthony Fairfax - final bill   | 5/16/2016  | \$3,400.00  |                                   |                                       | \$3,400.00                              |
|                        | Contract Paralegal Trial Support - Shannon Christian -half week starting 12/2/15   | 1/31/2016  | \$1,278.17  |                                   |                                       | \$1,278.17                              |
|                        | Contract Paralegal Trial Support - Shannon Christian -week of 12/7/15  | 12/13/2015 | \$1,429.68  |                                   |                                       | \$1,429.68                              |
|                        | Contract Paralegal Trial Support - Shannon Christian - week of 12/14/15  | 12/22/2015 | \$1,802.84  |                                   |                                       | \$1,802.84                              |
| Travel Costs           |  |            |             |                                   |                                       |   |
|                        | Mileage for Earls Travel to Elizabeth City for Wright MTD oral argument - reimbursement  | 2/27/2014  | \$211.68    |                                   |                                       | \$211.68                                |

|  |   |            |          |  |  |          |
|--|---|------------|----------|--|--|----------|
|  | Mileage for Riggs travel to Richmond for Wright oral argument - reimbursement | 12/15/2014 | \$150.10 |  |  | \$150.10 |
|  | Mileage for Earls travel to Richmond for Wright oral argument - reimbursement | 12/19/2014 | \$213.64 |  |  | \$213.64 |
|  | Lunch for Riggs in Richmond - Riggs CC  | 12/10/2014 | \$6.10   |  |  | \$6.10   |
|  | Hotel Bill - Refreshments - Wright Oral Argument - Riggs CC                   | 12/10/2014 | \$4.43   |  |  | \$4.43   |
|  | Dinner for Earls/Riggs in Richmond night before oral argument - Earls CC      | 12/9/2014  | \$51.96  |  |  | \$51.96  |
|  | Hotel Bill - Lodging - Wright Oral Argument - Riggs CC                        | 12/11/2014 | \$146.43 |  |  | \$146.43 |
|  | Hotel Bill - Lodging - Wright Oral Argument - Earls CC                        | 12/11/2014 | \$146.43 |  |  | \$146.43 |
|  | Hotel Bill - Refreshments - Wright Oral Argument - Riggs CC                   | 12/11/2014 | \$14.19  |  |  | \$14.19  |
|  | Hotel Bill - Breakfast for Earls/Riggs in Richmond - Riggs CC                 | 12/11/2014 | \$17.40  |  |  | \$17.40  |
|  | Valet at hotel to handle luggage and park car - Earls Reimbursement           | 12/9/2014  | \$10.00  |  |  | \$10.00  |
|  | Valet at hotel to handle luggage and park car - Earls Reimbursement           | 12/10/2014 | \$10.00  |  |  | \$10.00  |
|  | Maid service gratuity - Earls Reimbursement                                   | 12/10/2014 | \$10.00  |  |  | \$10.00  |
|  | Parking - Earls - in Richmond for Wright Oral argument - Earls CC             | 12/9/2014  | \$9.00   |  |  | \$9.00   |
|  | Refreshments - Riggs/Earls - after oral argument - Earls CC                   | 12/10/2014 | \$11.36  |  |  | \$11.36  |
|  | Parking - Witness Deposition Prep - Riggs CC                                  | 10/20/2015 | \$6.00   |  |  | \$6.00   |
|  | Parking - Witness Deposition Prep - Riggs CC                                  | 10/20/2015 | \$1.25   |  |  | \$1.25   |
|  | Parking - Witness Deposition Prep - Riggs CC                                  | 10/28/2015 | \$4.00   |  |  | \$4.00   |
|  | Parking - Witness Deposition Prep - Riggs CC                                  | 12/10/2015 | \$6.00   |  |  | \$6.00   |
|  | Parking - Witness Deposition Prep - Earls CC                                  | 12/10/2015 | \$4.00   |  |  | \$4.00   |
|  | Mileage for travel to witness prep meeting - Eppsteiner reimbursement         | 12/14/2015 | \$27.60  |  |  | \$27.60  |
|  | Mileage for travel to witness prep meeting - Eppsteiner reimbursement         | 12/15/2015 | \$20.70  |  |  | \$20.70  |
|  | Parking during trial - Earls CC   | 12/16/2015 | \$12.00  |  |  | \$12.00  |
|  | Mileage for travel to trial - Eppsteiner reimbursement                        | 12/16/2015 | \$27.60  |  |  | \$27.60  |
|  | Parking during trial - Earls CC   | 12/17/2015 | \$12.00  |  |  | \$12.00  |
|  | Mileage for travel to trial - Eppsteiner reimbursement                        | 12/17/2015 | \$27.60  |  |  | \$27.60  |
|  | Mileage for travel to trial - Eppsteiner reimbursement                        | 12/18/2015 | \$27.60  |  |  | \$27.60  |
|  | Parking during trial - Fred McBride reimbursement                             | 12/22/2015 | \$24.00  |  |  | \$24.00  |

|                        |  |            |                    |                   |                   |                    |
|------------------------|--|------------|--------------------|-------------------|-------------------|--------------------|
|                        | Mileage for travel to trial - Fred McBride - reimbursement                               | 12/22/2015 | \$48.30            |                   |                   | \$48.30            |
|                        | Mileage for Eppsteiner travel to Richmond for RWCA/Wright oral argument - reimbursement  | 5/13/2016  | \$185.15           |                   |                   | \$185.15           |
|                        | Parking and meals for travel to Richmond for RWCA/Wright oral argument - Eppsteiner CC   | 5/10/2016  | \$60.89            |                   |                   | \$60.89            |
|                        | Mileage for Earls/Riggs travel to Richmond for RWCA/Wright oral argument - reimbursement | 6/11/2016  | \$185.15           |                   |                   | \$185.15           |
|                        | Dinner for Earls/Riggs in Richmond (5/8/16) - Earls CC                                   | 6/11/2016  | \$47.24            |                   |                   | \$47.24            |
|                        | Hotel for Earls/Riggs in Richmond for RWCA/Wright oral argument - Earls CC               | 6/11/2016  | \$297.92           |                   |                   | \$297.92           |
|                        | Breakfast for Riggs in Richmond - Riggs CC   | 5/9/2016   | \$9.18             |                   |                   | \$9.18             |
|                        | Lunch for Earls/Riggs in Richmond - Riggs CC   | 5/9/2016   | \$23.21            |                   |                   | \$23.21            |
|                        |  |            |                    |                   |                   |                    |
| Other Litigation Costs |  |            |                    |                   |                   |                    |
|                        | Office Depot - trial supplies (exhibit notebooks)- Bethan Eynon CC                       | 12/4/2015  | \$706.09           |                   |                   | \$706.09           |
|                        | Office Depot - trial supplies - Riggs CC   | 12/7/2015  | \$83.39            |                   |                   | \$83.39            |
|                        | Office Depot - trial supplies - Earls CC   | 12/8/2015  | \$317.13           |                   |                   | \$317.13           |
|                        |  |            |                    |                   |                   |                    |
|                        | Office Depot - trial supplies - Kathleen Lockwood CC                                     | 12/11/2016 | \$245.91           |                   |                   | \$245.91           |
|                        | FedEx Office - trial demonstratives - Riggs CC   | 12/13/2015 | \$233.81           |                   |                   | \$233.81           |
|                        | Office Depot - trial supplies - Earls CC   | 12/13/2015 | \$300.27           |                   |                   | \$300.27           |
|                        | Staples - trial supplies - Bethan Eynon CC   | 12/14/2016 | \$144.68           |                   |                   | \$144.68           |
|                        | Food for Eppsteiner/witness during trial prep - Manhattan Café - Eppsteiner CC           | 12/14/2016 | \$10.67            |                   |                   | \$10.67            |
|                        |  |            |                    |                   |                   |                    |
|                        | Food for team during trial prep - Randys Pizza - Riggs CC                                | 12/14/2015 | \$22.52            |                   |                   | \$22.52            |
|                        | Food for team during trial - Neomonde - Riggs CC   | 12/15/2015 | \$53.19            |                   |                   | \$53.19            |
|                        |  |            |                    |                   |                   |                    |
|                        | Food for team during trial - Sawasdee Thai - Riggs CC                                    | 12/16/2015 | \$95.58            |                   |                   | \$95.58            |
|                        | Food for team during trial - Jimmy Johns - Riggs CC                                      | 12/16/2015 | \$100.75           |                   |                   | \$100.75           |
|                        | Food for team during trial - Jimmy Johns - Riggs CC                                      | 12/17/2015 | \$101.75           |                   |                   | \$101.75           |
|                        |  |            |                    |                   |                   |                    |
|                        | Food for team during trial - Bella Monica - Eppsteiner CC                                | 12/17/2015 | \$80.52            |                   |                   | \$80.52            |
|                        |  |            |                    |                   |                   |                    |
| <b>TOTAL</b>           |  |            | <b>\$56,831.34</b> | <b>\$2,689.80</b> | <b>\$6,367.88</b> | <b>\$47,773.66</b> |

# **EXHIBIT B**



Jowei Chen  
P.O. Box 8035  
Ann Arbor, MI 48107-8035

December 9, 2015

INVOICE  
VIA EMAIL

Re: Monthly work statement (Wright, et al., v. North Carolina, et al., and  
Raleigh Wake Citizens Association, et al., v. Barefoot, et al.)

To: Southern Coalition for Social Justice

Time period: October 13, 2015 to November 2, 2015

Description of Work: Preparation of expert report.

Hours Worked: 40 Hours

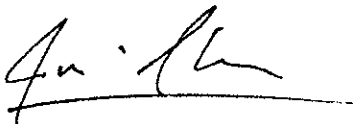
Rate: \$500/hour

**Total Payment due: \$20,000.00**

Notes: Please arrange a bank transfer to the following bank account or mail  
payment to the P.O. Box address listed above:

Bank Name: Charles Schwab Bank  
Account Name: Jowei Chen  
Account Type: Checking Account  
Routing Number: 121202211  
Account Number: 440021387574

Signed:

A handwritten signature in black ink, appearing to read 'J. Chen', written over a horizontal line.

Jowei Chen

Jowei Chen  
P.O. Box 8035  
Ann Arbor, MI 48107-8035

December 23, 2015

INVOICE  
VIA EMAIL

Re: Monthly work statement (Wright, et al., v. North Carolina, et al., and  
Raleigh Wake Citizens Association, et al., v. Barefoot, et al.)

To: Southern Coalition for Social Justice

| <b>Date:</b>      | <b>Cost:</b> | <b>Description of Work:</b>   |
|-------------------|--------------|---|
| December 15, 2015 | \$2,000      | On-location services (Preparation for testimony)  |
| December 16, 2015 | \$2,000      | On-location services (Preparation for testimony)  |
| December 17, 2015 | \$2,000      | On-location services (Court testimony)  |
| Travel Expenses   | \$1,413.42   | Receipts attached (\$882.70 airfare, \$358.54 hotel, \$134.54<br>grand transportation, and \$37.64 meals) |


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**Total Payment due: \$7,413.42**

Please mail payment to:

Jowei Chen  
P.O. Box 8035  
Ann Arbor, MI 48107-8035

Signed:



Jowei Chen

Date of Purchase: Dec 03, 2015



## Detroit, MI to Raleigh/Durham, NC

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### PASSENGER INFORMATION

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JOWEI CHEN  
SkyMiles Number: 2137269417

Confirmation Number: HZ3GRP  
Ticket Number: 0062328352041

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### FLIGHT INFORMATION

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| Date and Flight                    | Status | Class | Meals/Orders | Seat/Cabin |
|------------------------------------|--------|-------|--------------|------------|
| DTW > RDU<br>Tue 15Dec2015 DL 2274 | FLWN   | M     |              | 12A        |
| RDU > ATL<br>Thu 17Dec2015 DL 679  | FLWN   | T     |              | 43A        |
| ATL > DTW<br>Thu 17Dec2015 DL 1290 | FLWN   | T     |              | 28F        |

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### DETAILED CHARGES

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#### Air Transportation Charges

Base Fare: \$786.97 USD

#### Taxes, Fees & Charges:

|   |             |
|---|-------------|
| United States - September 11th Security Fee(Passenger Civil Aviation Security Service Fee) (AY) | \$11.20 USD |
| United States - Transportation Tax (US)   | \$59.03 USD |
| United States - Passenger Facility Charge (XF)  | \$13.50 USD |
| United States - Flight Segment Tax (ZP)   | \$12.00 USD |

**Total Price: \$882.70 USD**

Paid with Visa \*\*\*\*\*6846

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### KEY OF TERMS

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# - Arrival date different than departure date  
\*\* - Check-in required  
\*\*\* - Multiple meals  
\*SS - Multiple seats  
AR - Arrives  
B - Breakfast  
C - Bagels / Beverages  
D - Dinner

Check your flight information online at [delta.com](http://delta.com) or call the Delta Flightline at 800.325.1999.

Baggage and check-in requirements vary by airport and airline, so please check with the operating carrier on your ticket.

F - Food available for purchase  
L - Lunch  
LV - Departs  
M - Movie  
R - Refreshments, complimentary  
S - Snack  
T - Cold meal  
V - Snacks for sale

Please review Delta's **check-in requirements** and **baggage** guidelines for details.

You must be checked in and at the gate at least 15 minutes before your scheduled departure time for travel inside the United States.

You must be checked in and at the gate at least 45 minutes before your scheduled departure time for international travel.

For tips on flying safely with laptops, cell phones, and other battery-powered devices, please visit [http:// SafeTravel.dot.gov](http://SafeTravel.dot.gov)

Do you have comments about service? Please **email** us to share them.

## NON-REFUNDABLE / CHANGE FEE

When using certain vouchers to purchase tickets, remaining credits may not be refunded. Additional charges and/or credits may apply and are displayed in the sections below.

This ticket is non-refundable unless issued at a fully refundable fare. Any change to your itinerary may require payment of a change fee and increased fare. Failure to appear for any flight without notice to Delta will result in cancellation of your remaining reservation.

All Delta Comfort+™ and Preferred seats are Nonrefundable.

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- **Limits on our liability** for personal injury or death of passengers, and for loss, damage or delay of goods and baggage.
- **Claim restrictions** including time periods within which you must file a claim or bring action against us.
- Our right to **change terms** of the contract.
- **Check-in requirements** and other rules established when we may **refuse carriage**.
- Our rights and limits of our liability for **delay of failure to perform service**, including schedule change, substitution of alternative air carriers or aircraft, and rerouting.
- Our policy on **overbooking flights**, and your rights if we deny you boarding due to an oversold flight.

These terms are incorporated by reference into our contract with you. You may view these **conditions of carriage** on [delta.com](http://delta.com), or by requesting a copy from Delta.

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Courtyard Raleigh-Durham Airport

2001 Hospitality Court  
Morrisville, NC 27560  
T 919.467.9444

J. Chen

Room: 333

Room Type: QNQN

Number of Guests: 1

Rate: \$159.00

Clerk:

Arrive: 15Dec15

Time: 03:49PM

Depart: 17Dec15

Time:

Folio Number: 96463

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| Date    | Description                                    | Charges | Credits |
|---------|--|---------|---------|
| 15Dec15 | Room Charge                                    | 159.00  |         |
| 15Dec15 | Occupancy Sales Tax                            | 10.73   |         |
| 15Dec15 | County Tax                                     | 9.54    |         |
| 16Dec15 | Room Charge                                    | 159.00  |         |
| 16Dec15 | Occupancy Sales Tax                            | 10.73   |         |
| 16Dec15 | County Tax                                     | 9.54    |         |
| 17Dec15 | Visa   |         | 358.54  |
|         | Card #: VXXXXXXXXXXXX6846/XXXX                 |         |         |
|         | Amount: 358.54 Auth: 08230D Signature on       |         |         |
|         | File   |         |         |
|         | This card was electronically swiped on 15Dec15 |         |         |
|         | Balance:                                       | 0.00    |         |

As a Rewards Member, you could have earned points toward your free dream vacation today. Start earning points and elite status, plus enjoy exclusive member offers. Enroll today at the front desk.

Marriott and A Woman's Nation join forces to increase appreciation for hotel housekeepers whose care and hard work often go unnoticed.

As requested, a final copy of your bill will be emailed to you at: JOWEI@UMICH.EDU. See "Internet Privacy Statement" on Marriott.com.



Jowei Chen &lt;jowei.chen@gmail.com&gt;

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**Payment Receipt [For Conf# 30349]**

1 message

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**American Airport Car Service** <info@americanairportservice.com>  
To: jowei@umich.edu

Fri, Dec 4, 2015 at 1:17 PM

**American Airport Car Service**

www.americanairportservice.com

United States of America

Tel: (800)991-5964 Fax: (800)991-5964

Email: info@americanairportservice.com

**Payment Receipt****For Confirmation #30349**

Timestamp: 12/04/2015 01:17 PM

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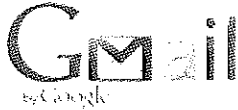
Thank you for traveling with American Airport Car Service. Your payment was submitted successfully.  
Please print this receipt for your records.

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|                              |  |
|------------------------------|--|
| <b>Method:</b>               | MC ** 6007   |
| <b>Type:</b>                 | AUTH_CAPTURE   |
| <b>Transaction Amount:</b>   | \$62.27  |
| <b>Reference/Trans. ID:</b>  | 6931239275   |
| <b>Passenger:</b>            | Jowei Chen   |
| <b>Trip Confirmation#</b>    | 30349  |
| <b>Trip Date &amp; Time:</b> | 12/15/2015 @ 12:15 PM  |
| <b>Routing Information:</b>  | <b>Pick-up Location:</b> 201 S. 1st. Street Ann Arbor, MI<br><b>Drop-off Location:</b> DTW, Delta Airlines - DL 2274 |
|                              | <b>Reservation Total:</b> \$62.27  |
|                              | <b>Payments/Deposits:</b> \$62.27  |
|                              | <b>Authorizations:</b> \$0.00  |
|                              | <b>Total Due:</b> \$0.00   |

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Jowei Chen &lt;jowei.chen@gmail.com&gt;

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**Payment Receipt [For Conf# 30350]**

1 message

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**American Airport Car Service** <info@americanairportservice.com>  
To: jowei@umich.edu

Fri, Dec 4, 2015 at 3:14 PM

**American Airport Car Service**

www.americanairportservice.com

United States of America

Tel: (800)991-5964 Fax: (800)991-5964

Email: info@americanairportservice.com

**Payment Receipt****For Confirmation #30350**

Timestamp:12/04/2015 03:13 PM

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Thank you for traveling with American Airport Car Service. Your payment was submitted successfully.  
Please print this receipt for your records.

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|                              |  |
|------------------------------|--|
| <b>Method:</b>               | MC ** 6007   |
| <b>Type:</b>                 | AUTH_CAPTURE   |
| <b>Transaction Amount:</b>   | \$72.27  |
| <b>Reference/Trans. ID:</b>  | 6937671794   |
| <b>Passenger:</b>            | Jowei Chen   |
| <b>Trip Confirmation#</b>    | 30350  |
| <b>Trip Date &amp; Time:</b> | 12/17/2015 @ 11:52 PM  |
| <b>Routing Information:</b>  | <b>Pick-up Location:</b> DTW, Delta Airlines - DL 1290, From/To: Atlanta<br><b>Drop-off Location:</b> 201 S. 1st. Street Ann Arbor, MI |
|                              | <b>Reservation Total:</b> \$72.27  |
|                              | <b>Payments/Deposits:</b> \$72.27  |
|                              | <b>Authorizations:</b> \$0.00  |
|                              | <b>Total Due:</b> \$0.00   |

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HBF #111 Zingerman's Kiosk  
Detroit Metropolitan  
Airport  
Detroit, MI

COURTYARD BY MARRIOTT  
Raleigh Durham Airport  
2001 Hospitality Ct  
Morrisville, NC 27560  
919-467-9444  
B I S T R O eat drink connect  
16 DEC'15 6:51 AM

5014 Troy S

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Chk 1011      Dec15'15 01:31P    Gst   0  
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|                  |       |
|------------------|-------|
| Dine In          |       |
| 1 Fruit Cup      | 4.99  |
| 1 Chk Salad Sand | 9.99  |
| XXXXXXXXXXXX6846 |       |
| Visa             | 15.88 |
| Subtotal         | 14.98 |
| Tax              | 0.90  |
| Payment          | 15.88 |
| Sales Tax        | 0.90  |

If we did or did not exceed your  
expectations, we would like to  
hear from you. Please call  
800-426-5971 x1021 or email  
111@hbfcare.com

Check:      39295  
Table:      2/5  
Server:     11212 Jocelyn  
Card Type: VISA  
Acct Num: \*\*\*\*\*6846  
Auth Code: 04247D  
Customer: JOWEI CHEN

Amount :                      \$21.76

GRATUITY\_\_\_\_\_

TOTAL\_\_\_\_\_

SIGNATURE\_\_\_\_\_

Thank you for joining us  
at Courtyard by Marriott !

# **EXHIBIT C**

## EXPERT REDISTRICTING SERVICES AGREEMENT

THIS REDISTRICTING SERVICES AGREEMENT (this "Agreement") is made as of October 10, 2015, between the Southern Coalition for Social Justice ("SCSJ") and, CensusChannel LLC ("Consultant").

The purpose of this agreement is to procure the services of the Consultant in relation to the consolidated case of Raleigh Wake Citizens Association, et al., v. Wake County Board of Elections, No. 15-cv-156 and Wright, et al. v. Wake County Board of Elections, No. 13-cv-607 (hereinafter "Case") pending before the United States District Court for the Eastern District of North Carolina. The Consultant shall provide services for the SCSJ as an independent professional. Payment to the Consultant is not dependent upon the findings, which the Consultant renders, nor on the outcome of any legal action, mediation, arbitration, or the amount or terms of any settlement of the underlying legal cause, nor on any contractual arrangement between the SCSJ and any other person or party.

**Engagement Fee:** At the time of the execution of this agreement, the SCSJ shall tender to the Consultant a non-refundable engagement fee in the amount of Two Thousand dollars (\$2,000.00). Billings for services performed or expenses incurred shall be charged against the engagement fee until such time as it is exhausted. The SCSJ shall not identify the Consultant as either a testifying or non-testifying expert until such time as the engagement fee has been paid.

**Personnel:** The Consultant agrees that Anthony E. Fairfax will be the personnel tasked to provide all major Services outlined under this Agreement. The Consultant must obtain prior written agreement from SCSJ if the Consultant assigns any other person to perform minor services outlined in this Agreement other than Anthony E. Fairfax.

**Consultant Fees:** Except as outlined herein, the SCSJ shall compensate the Consultant at the rate of \$185.00 per hour for all tasks performed under this agreement, including but not limited to analysis, calculations, conclusions, preparation of reports, and necessary travel time. Fees will be billed in half of an hour increments, with a minimum charge of an hour. Daily rates when traveling, not to include testimony at deposition or trial, will accrue at \$1,700 per day. Fees will be billed in half of a day increments, with a minimum charge of one day.

For testimony at deposition or trial, the SCSJ shall compensate the Consultant at the rate of \$2,000 per day. This rate for testimony shall apply both while the Consultant is waiting to give testimony, whether at an office or court, and for time taken for breaks or meals, as well as for time spent actually giving testimony. Fees will be billed in half of a day increments, with a minimum charge of one day.

Total final payment amount may be modified with the mutual written agreement of both parties.

**Expenses:** Expenses incurred by the Consultant shall be reimbursed on a monthly basis by the SCSJ, as follows:

- Travel by Car: 51 cents per mile;
- Travel by Air or Train: The actual cost of the round-trip ticket.
- Expenses associated with reproduction of documents and photographs, preparation of exhibits, storage of materials or evidence, and other reasonable expenditures shall be reimbursed at market rates.
- Lodging: For any traveling of more than seventy-five (75) miles from the Consultant's office, the Consultant shall be reimbursed for the cost of meals and lodging.
- Car Rental: In the event of travel beyond the local area, the Consultant shall be reimbursed for the cost of a mid-sized rental car and any associated expenses.
- Unless otherwise instructed by the SCSJ, or unless refundable tickets are not available, the Consultant will purchase refundable tickets for any necessary travel. Should the SCSJ request that the Consultant purchase non-refundable tickets in order to travel at a lower cost, or if refundable tickets are not available, the SCSJ shall reimburse the Consultant for the cost of any non-refundable ticket at the rate outlined herein whether or not the ticket is used.

**Qualifications:** The SCSJ has had the opportunity to investigate and verify the Consultant's credentials, and agrees that the Consultant is qualified to perform the services described in this contract.

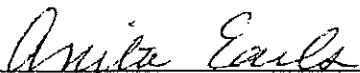
**Terms of Engagement:** The SCSJ is responsible for payments to the Consultant as outlined in this contract, regardless of any arrangement the SCSJ has with any party or parties he represents. The Consultant will issue invoices periodically and are due upon the resolution of the Case.

**Jurisdiction:** This agreement shall be interpreted under the laws of the State of North Carolina.

The parties hereto have executed this agreement as of the date and year first set forth above:

**Southern Coalition for Social Justice:**

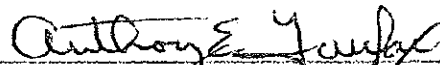
**CensusChannel LLC:**



Authorized Representative



Date



Authorized Representative

Oct. 20, 2015

Date

Anthony Fairfax

11/6/2015

| Date      | Type | Reference  | Original Amt. | Balance Due  | Discount | Payment  |
|-----------|------|------------|---------------|--------------|----------|----------|
| 11/6/2015 | Bill | SVCS NOV-A | 2,000.00      | 2,000.00     |          | 2,000.00 |
|           |      |            |               | Check Amount |          | 2,000.00 |

Bank of NC - Checkin Expert Witness Fee

2,000.00



CensusChannel LLC  
4410 E. Claiborne Square  
Suite 334  
Hampton, VA 23666  
(800)838-8595  
fairfax@censuschannel.com

## INVOICE

**BILL TO**

Anita Earls  
Southern Coalition for Social  
Justice  
1415 West Highway 54  
Suite 101  
Durham, NC 27707

**INVOICE # 1228****DATE 03/28/2016****DUE DATE 03/28/2016****TERMS Due on receipt**

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| ACTIVITY   | QTY | RATE     | AMOUNT   |
|--|-----|----------|----------|
| Wake County, NC Redistricting  |     |          |          |
| Expert Testimony/Deposition  | 2   | 1,700.00 | 3,400.00 |
| Travel to/from Raleigh for testimony (Wright v North Carolina)<br>on Dec. 15 & 16th, 2015 (2 days) |     |          |          |

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Partial payment for work (testimony only). Thank you for your  
business!

**BALANCE DUE****\$3,400.00**